

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
Joint Stock Company "Channel One Russia Worldwide,"
Closed Joint Stock Company "CTC Network," Closed
Joint Stock Company "TV DARIAL," Closed Joint
Stock Company "New Channel", Limited Liability
Company "Rain TV-Channel," Limited Liability
Company "Veriselintel," Open Joint Stock Company
"ACCEPT", and Limited Liability Company "Comedy TV."

Index No. 16-cv-01318

Plaintiffs,

**AFFIDAVIT OF
CHRISTOPHER
VIDULICH**

-against-

INFOMIR LLC (www.infomirusa.com),
PANORAMA TV (www.mypanorama.tv),
GOODZONE TV (www.gudzon.tv),
MATVIL CORPORATION d/b/a eTVnet (www.etvnet.com),
MIKHAIL GAYSTER and
John Does 1-50.

Defendants.

-----X
STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

CHRISTOPHER VIDULICH, being duly sworn, deposes and says:

1. I am over the age of eighteen, not a party to this action, and employed at Dunnington Bartholow & Miller LLP.
2. The purpose of this affidavit is to explain the functionality of set-top-boxes sold by the defendant Infomir LLC ("Infomir") using the example of Infomir's AURA HD box.
3. I do not have any specialized technical knowledge. The information herein is

based on either disclosed research sources as indicated herein, or on direct personal observation from my interactions with and usage of the AURA HD box.

4. On May 13th, 2016 and June 22nd, 2016 I logged onto one of Infomir's websites from a computer located in New York and connected to the internet and saw that many types of set-top boxes are sold through Infomir on its website.

5. The website www.infomirusa.com, as set forth in the caption above, redirects to www.infomir.eu (last accessed on June 22, 2016).

6. It appears that Infomir also operates www.infomir.us.

7. Infomir's website, infomir.eu, mentions that it also produces Aura HD set-top boxes, and advertises the Aura HD as an enhancement of the other "base model" set top boxes. I have attached hereto as **Exhibit 1** a screenshot of Infomir's website explaining the Aura HD project.

8. I then visited www.aurahdtv.com and saw that the set-top box allows viewers to "watch internet television from leading service providers all over the world without cable, satellite dish and regular fee payment." I have attached hereto as **Exhibit 2** a screenshot of the Aura HD website explaining the functionality of the set top box.

9. Traditionally, a set-top box is a device that converts exterior signals into a form that can be broadcast on a television screen. The Aura HD box is a specialized type of set-top box called an "IPTV receiver" that provides two way communications on an internet protocol network and decoding the video streaming media. I have attached hereto as **Exhibit 3** a screenshot of a Wikipedia article explaining the functions of an IPTV receiver.

10. The AURAHD website also explains that the set-top boxes are distributed in more than 37 countries including the United States of America with more than 70,000 users

worldwide. I have attached hereto as **Exhibit 4** a printout from the Aura HD Website explaining their services.

11. Also on May 13, 2016, I examined an AURA HD box in the conference room of our law firm. I noted that on the packaging for the AURA HD box, the contact email sales@infomir.eu was listed. I have attached hereto as **Exhibit 5** a photograph of the packaging for the AURA HD box.

12. With the assistance of our office's technical director, I then connected an AURA HD set-top-box to a projector using an HDMI cord and logged on to a wireless internet connection. I also connected the AURA HD box to a laptop computer using an Ethernet cable. I have attached hereto as **Exhibit 6** a photograph of the set-up of the Aura HD box, projector, and laptop computer.

13. On the menu screen I proceeded to click on the icon 'online media', leading me to 'my applications'. I have attached hereto as **Exhibit 7** a photograph of the applications screen.

14. Using the application "Online TV" on the Aura HD box, I was able to view several Russian Language television broadcasts.

15. Among the Russian-language channels I was able to view were several owned and produced by Plaintiffs including CTC, Che, Channel One, Nostalgia, and Vremya I have attached hereto as **Exhibits 8-12** examples of each of the above channels respectively.

16. I additionally was able to see that the channel "Domashny" was being offered but the stream was broken and unviewable. I have attached hereto as **Exhibit 13** a photograph of the broken Domashny channel stream.

17. Except for the Domashny channel, the quality of the streams that I observed and audio that I heard through the player was excellent and comparable to domestic cable.

18. On May 27th, 2016, I once again set up the AuraHD box as I had previously done on May 13th (see **Exhibit 6**).

19. The reason I did so was that we wished to analyze the source of the content being streamed into the AURA HD box.

20. I then proceeded to use a network protocol analyzer that allows for the monitoring of Internet Protocol traffic running on a computer network to capture the Internet Protocol addresses of the sources sending video streaming media for the Aura HD box to decode and display on a television screen (as set forth in ¶ 9 above).

21. I opened the network protocol analyzer and began to capture the activity on the Aura HD box.

22. I then opened the Channel One broadcast, identifiable by the Channel One logo (pictured below) in the upper right hand corner of the broadcast, in the Online TV section of “My Applications.” (see **Exhibit 10**)



23. Once the network protocol analyzer had begun to capture the activity on the Aura HD box, I stopped the capture process.

24. I scanned through the activity that was captured while the Channel One stream was active and noted that the Aura HD box connected to “freetvstat.iptv.infomir.com.ua,” and that the IP address for this URL is 66.234.224.2. I have attached hereto as **Exhibit 14** a screenshot of the network protocol analyzer readout displaying the device’s connection with Infomir.

25. I then entered this URL into IPlocation.net and found that the IP address is located within the United States and that the Internet Service Provider is Transbeam Inc. I have attached hereto as **Exhibit 15** a screenshot of the IPlocation.net page displaying this information.

26. I continued scanning through the activity that was captured while the Channel One stream was active and noted that the Aura HD box also connected to a “stalker portal” and that the IP address associated with this portal is 37.58.59.33. I have attached hereto as **Exhibit 16** a screenshot of the Wireshark readout displaying the device’s connection with the “stalker portal.”

27. I then entered this URL into IPlocation.net and found that the IP address is located in Frankfurt, Germany and that the internet service provider is LeaseWeb Deutschland GmbH. I have attached hereto as **Exhibit 17** a screenshot of the IPlocation.net page displaying this information.

28. Infomir’s website, infomir.eu, enables a user in the United States and elsewhere to download “Free Stalker Middleware” to the set-top boxes sold by Infomir. According to Infomir, “Stalker Middleware” enables users to view IPTV with “[n]o payments, no contracts, no tricks.” I have attached hereto as **Exhibit 18** screenshots from the Infomir website explaining the functionality of the Stalker Middleware.

29. Infomir’s website, infomir.eu, refers United States based consumers to Infomir USA located in Brooklyn, New York and Calyani Electronics in Miami, Florida to purchase Infomir’s products. I have attached hereto as **Exhibit 19** screenshots from the INfomir website displaying this information.

30. As of June 22, 2016, www.infomir.us provides under its “support” tab that “Infomir is not involved in any content distribution activity. . .” I have attached hereto as

Exhibit 20 a screenshot of Infomir's website displaying the Support information. This assertion appears to be incorrect in light of the fact that I was able to trace the source of Channel One to freetvstat.iptv.infomir.com.ua as set forth in ¶ 25, above.

31. On June 22, 2016 I logged onto the Internet Archive's "Wayback Machine" in order to review any updates to www.infomir.us. As of November 27, 2015, www.infomir.us did not include the language quoted in the preceding paragraph and in fact contained no "support" tab at all. I have attached hereto as **Exhibit 21** a screenshot of Infomir's website from November 27, 2015.

32. According to the Wayback Machine, the "support" tab including the language quoted above was not added until after this lawsuit was commenced on March 22, 2016. I have attached hereto as **Exhibit 22** a screenshot of Infomir's website from March 22, 2016.

33. Counsel for Infomir provided counsel for Plaintiffs with an executed waiver of summons form on March 29, 2016. I have attached hereto as **Exhibit 23** a copy of the executed waiver of summons form.


CHRISTOPHER VIDULICH

SWORN TO ME THIS 24TH
DAY OF JUNE 2016


NOTARY PUBLIC

MARISOL VENDRELL
Notary Public, State of New York
No. 01VE6129563
Qualified in Bronx County
Certificate Filed in New York County
Commission Expires June 27, 2017

EXHIBIT 1

About Infomir - Internet Explorer
<http://www.infomir.eu/en/about/profile/>
 File Edit View Favorites Tools Help


Cablevision Systems Corp., v. D... IPTV/OTT and hybrid Set-Top B... mag 250 - Google Search DrPeering White Paper - Intern... About Infomir

im infomir [Contact Sales](#) | [Where to buy](#) | [Choose your MAG](#) | English

Other projects

Apart from the products on the website, Infomir works on related projects at its own facilities.

AuraHD Project



AuraHD digital media players are Set-Top Boxes that have access to a number of OTT services.

MAG250, MAG254 and MAG275 Set-Top Boxes are served as base models for AuraHD media players. Technical support and regular upgrades are included, which enhance the media players' performance capabilities.

For press

Denys Gorbunov
 +38 (048) 740 6 740
pr@infomir.eu

OUR PARTNERS

EXHIBIT 2

Products - Internet Explorer

http://www.aurahd.com/en/ment/

PR/Backend/Stalker Middlewar... Products

MAGic Solution from Infomir

File Edit View Favorites Tools Help

aura HD
INTERNATIONAL

EN RU DE TR

+49 6934879850
+49 6934877353

Campaigns Products Applications Support About us Buy

Products

[Home](#) > Products

[Accessories](#)

[Specification](#)

Products

The Infomir GmbH presents a new version of our device a **home multimedia center AuraHD International Second Edition**. With its help you'll be able to watch Internet television from leading service providers all over the world without cable, satellite dish and regular fee payment. All you need is to connect the device to your TV set and to a network. The small box combines the best functions of SmartTV and DVD player, expands opportunities of your TV and turns your house into an entertainment zone.

Let's take a look at all the advantages of AuraHD International Second Edition

Nothing is impossible. Do whatever you want.

Watch news, sports, movies, shows and TV series in your native language in Online TV app.

Listen to the world-famous radio stations

Get access to websites: Facebook, YouTube, Twitter, Google, Picasa, Blogger etc.

Play your own media in FullHD format.

Enjoy games.


Watch weather forecast.

NEW!

Choose your favorites

We do our best to satisfy even the most delicate demands. Application catalogue allows to install an app of any content provider you like for free.

Become a reseller



Start

4:35 PM
5/16/2016

EXHIBIT 3





EXHIBIT 4



- [Campaigns](#)
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- [Applications](#)
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- [About us](#)
- [Buy](#)

- [EN](#)
- [RU](#)
- [DE](#)
- [TR](#)

 +49 6934879850

 +49 6934877353



About us

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- ['Parade of gifts' draw results](#)
- [News](#)

About us

The Infomir GmbH is the branch of group of companies, specializing in the design, manufacturing and maintenance of equipment and client devices for advanced broadband services. The company is focused on sales optimizations, logistics and technical support for industrial and consumer electronics for interactive services VOD / IPTV all over the Europe territory.

The principal features of "Infomir" it's full production cycle: highly innovative product design, industrial design, software development, factory productions, support in integrations and implementations and services professional support. The Infomir GmbH consists of two specialized design offices, experimental laboratory of broadband networks, professional technical and service support, advisory center for implementation and provision of VoD/IPTV multimedia services. Production volumes of Our Company are provided with giant manufacturer of industrial and home electronics "TeleTec" Company. In addition, productions volumes for West Europe countries are provided with platforms of Our contract vendor "Jabil" Company.

Solutions for the market of interactive television from Infomir Company are unprecedented combination of convenience, compactness, high capacity and low costs; that ensure popularity and a expectations from customers and commercial markets around the world. For today, more than one million users worldwide got

advantages of high-quality products from Infomir Company; the distribution network of Our products covers more than 37 countries, including Russia, USA, Germany, Bulgaria, Great Britain, Poland, Australia, and many other countries. Each device passes quality control at all production phases, and process of a complete set packaging is monitored by the video surveillance systems.

Our competitive advantages on the market:

- complex services support and consulting;
- constant analysis of actual and modern technologies of television and video content markets, and requirements of the end-users;
- the regular upgrade of the equipment's technical characteristics and extension of functionalities.

Become
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HD

+49 6934879850

Online support

© Aura HD international 2012

EXHIBIT 5

aura HD
international

RUS

**Сетевой медиаплеер
«АураЭйчДи Интернейшнл»**

Производитель:
ООО «Телекоммуникационные
технологии», пл. Таможенная, 1,
г. Одесса, 65026, Украина

Произведено по заказу
«Infomir GmbH»
Найзерштрассе, 56,
Франкфурт, 60329, Германия
тел.: +49 69 348 798 50
e-mail: sales@infomir.eu

UKR

**Мережевий медіаплеєр
«АураЕйчДі Інтернейшнл»**

Виробник:
ТОВ «Телекомунікаційні
технології» пл. Митна, 1,
м. Одеса, 65026, Україна

Вироблено на замовлення
«Infomir GmbH»
Найзерштрассе, 56,
Франкфурт, 60329, Німеччина
тел.: +49 69 348 798 50
e-mail: sales@infomir.eu

ENG

**Network Mediaplayer
«AuraHD International»**

Manufactured by:
Telecommunication
Technologies Ltd, 1, Mytna sq.,
Odessa, 65026, Ukraine

Manufactured for
Infomir GmbH
56, Kaiserstrasse, Frankfurt
Germany, 60329
tel.: +49 69 348 798 50
e-mail: sales@infomir.eu

GER

**Netzmediaplayer
«AuraHD International»**

Herzteller: Telecommunication
Technologies GmbH
1, Mitna Platz,
Odessa, 65026, Ukraine

Produziert nach die Bestelle
Infomir GmbH
56, Kaiserstrasse, Frankfurt
Deutschland, 60329
tel.: +49 69 348 798 50
e-mail: sales@infomir.eu



4
Aur

EXHIBIT 6

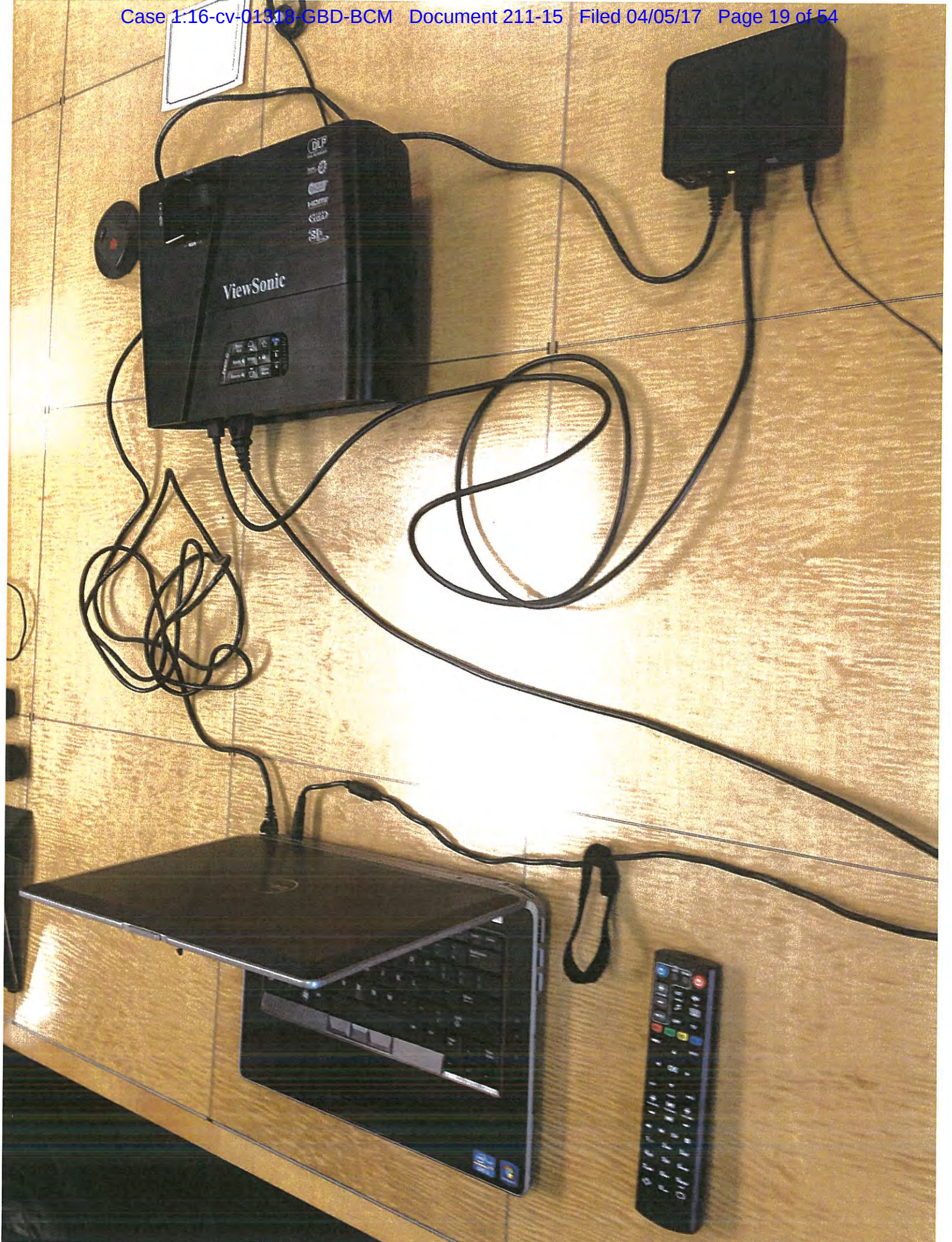


EXHIBIT 7

Applications

My applications

Application catalogue:

Video

Communication

News

Utilities

Remove application

Terms of Use



Online TV

EXHIBIT 8

Online TV /

TV GUIDE

СТС



16:30 - Т/с "Кухня".

18:30 - Т/с "Кухня".

19:00 - Т/с "Кухня".

19:35 - Премьера. Шоу "Уральских
пельменей". "Хочу всё ржать", 3 ч.
21:00 - Х/ф "Джек Ричер".

1	Первый канал Вс...	SQ	ru
2	РТР Планета	SQ	ru
3	Россия 24	SQ	ru
4	Россия Культура	SQ	ru
5	Zee TV	SQ	ru
6	Улыбка Ребенка	SQ	ru
7	Психология 21	SQ	ru
8	Звезда	SQ	ru
10	Первый канал Ро...	LQ	ru
12	ТНТ	SQ	ru
13	R1	SQ	ru
14	СТС	SQ	ru
15	Россия 1	SQ	ru
16	Матч! ТВ	SQ	ru

PAGE 1 OF 27. FOUND 372 RECORDINGS.



LANGUAGE



GENRE



+/- FAVORITE



FILTER

EXHIBIT 9

Online TV /

103	Русский Иллюзи...	LQ	ru
104	Русский Бестсел...	LQ	ru
105	Перец	LQ	ru
106	Сарафан	LQ	ru
107	Zoo Парк	LQ	ru
108	Домашний	LQ	ru
109	РЖД	LQ	ru
110	2x2	LQ	ru
113	Boomerang	LQ	ru
300	НТН	SQ	ua
301	5 Канал	SQ	ua
302	УТ-1(перший)	SQ	ua
303	1+1	SQ	ua
304	Канал 112	LQ	ua



PAGE 7 OF 27. FOUND 372 RECORDINGS.



LANGUAGE



GENRE



+/- FAVORITE



FILTER

TV GUIDE

EXHIBIT 10

Online TV / RUSSIAN /

1	Первый канал...	SQ	ru
2	РТР Планета	SQ	ru
3	Россия 24	SQ	ru
4	Россия Культура	SQ	ru
5	Zee TV	SQ	ru
6	Улыбка Ребенка	SQ	ru
7	Психология 21	SQ	ru
8	Звезда	SQ	ru
10	Первый канал Ро...	LO	ru
12	TNT	SQ	ru
13	R1	SQ	ru
14	CTC	SQ	ru
15	Россия 1	SQ	ru
16	Матч! ТВ	SQ	ru

PAGE 1 OF 7, FOUND 93 RECORDINGS.



LANGUAGE



GENRE



+1 FAVORITE



FILTER



TV GUIDE

18:00 - Вечерние новости (с субтитрами).

18:45 - "Человек и закон" с Алексеем

Пимановым.

19:50 - "Поле чудес".

21:00 - "Время".

21:30 - Т/с "Охотники за головами", 7 и 8 с.

EXHIBIT 11



EXHIBIT 12

Online TV /

82	МузТВ	LQ	RU
83	ТВЦ	LQ	RU
84	Brodilo	LQ	RU
85	MusicBox RU	LQ	RU
87	Вместе РФ	LQ	RU
88	TV1000 Русское к...	LQ	RU
89	Время	LQ	RU
91	Дом кино	LQ	RU
94	Живи	LQ	RU
95	Трофей HD	LQ	RU
97	ОТР	LQ	RU
99	ПИК ТВ	LQ	RU
100	1HD	LQ	RU
101	Ю	LQ	RU

PAGE 6 OF 27. FOUND 372 RECORDINGS.

TV GUIDE



FILTER

+/- FAVORITE

GENRE

LANGUAGE

EXHIBIT 13

Online TV - RUSSIAN

103	Русский Иллюзи...	LQ	RU
104	Русский Бестсел...	LQ	RU
105	Перец	LQ	RU
106	Сарафан	LQ	RU
107	Zoo Парк	LQ	RU
108	Домашний	LQ	RU
109	РЖД	LQ	RU
110	2x2	LQ	RU
113	Boomerang	LQ	RU

PAGE 7 OF 7. FOUND 93 RECOMMENDS



LANGUAGE



GENRE



FAVORITE



FILTER

▲ TV GUIDE ▲

EXHIBIT 14

Channel One Capture.pcapng

File Edit View Go Capture Analyze Statistics Telephony Wireless Tools Help

ip.addr==192.168.12.136 Expression... + Apply this filter Apply this filter Apply this filter

No.	Time	Source	Destination	Protocol	Length	Info
54	15.509021	192.168.12.136	37.48.77.49	HTTP	665	POST /load.php HTTP/1.1 (application/x-www-form-urlencoded)
55	15.596540	37.48.77.49	192.168.12.136	HTTP	289	HTTP/1.1 200 OK (text/html)
56	15.596827	192.168.12.136	37.48.77.49	TCP	66	50715 → 80 [ACK] Seq=2321 Ack=4104 Win=2312 Len=0 TSval=1602455 TSecr=135510591
72	22.970968	192.168.12.136	66.234.224.2	DNS	90	Standard query 0x1c60 A freetvstat.iptv.infomir.com.ua
73	22.980869	66.234.224.2	192.168.12.136	DNS	90	Standard query response 0x1c60 Refused A freetvstat.iptv.infomir.com.ua
74	22.981285	192.168.12.136	8.8.8.8	DNS	90	Standard query 0x1c60 A freetvstat.iptv.infomir.com.ua
76	23.035708	8.8.8.8	192.168.12.136	DNS	106	Standard query response 0x1c60 A freetvstat.iptv.infomir.com.ua A 79.142.197.4
77	23.037415	192.168.12.136	79.142.197.4	TCP	74	44657 → 80 [SYN] Seq=0 Win=5840 Len=0 MSS=1460 SACK_PERM=1 TSval=1609895 TSecr=0 WS=16
78	23.160212	79.142.197.4	192.168.12.136	TCP	74	80 → 44657 [SYN, ACK] Seq=0 Ack=1 Win=14480 Len=0 MSS=1428 SACK_PERM=1 TSval=657155035 TSecr=1609895 WS=128
79	23.160468	192.168.12.136	79.142.197.4	TCP	66	44657 → 80 [ACK] Seq=1 Ack=1 Win=5840 Len=0 TSval=1610018 TSecr=657155035
80	23.163171	192.168.12.136	79.142.197.4	HTTP	591	PUT /00:1a:79:09:7a:de HTTP/1.1 (application/x-www-form-urlencoded)
81	23.285172	79.142.197.4	192.168.12.136	TCP	66	80 → 44657 [ACK] Seq=1 Ack=526 Win=15616 Len=0 TSval=657155066 TSecr=1610019

Frame 12: 371 bytes on wire (2968 bits), 371 bytes captured (2968 bits) on interface 0

Ethernet II, Src: Telecomu_09:7a:de (00:1a:79:09:7a:de), Dst: Dell_67:34:b6 (5c:26:0a:67:34:b6)

Internet Protocol Version 4, Src: 192.168.12.136, Dst: 37.48.77.49

Transmission Control Protocol, Src Port: 50715 (50715), Dst Port: 80 (80), Seq: 1, Ack: 1, Len: 305

Hypertext Transfer Protocol

```

0000 5c 26 0a 67 34 b6 00 1a 79 09 7a de 08 00 45 00 \&.g4... y.z...E.
0010 01 65 a9 65 40 00 40 06 50 9c c0 a8 0c 88 25 30 .e.e@. P.....%0
0020 4d 31 c6 1b 00 50 05 c0 74 3b 76 d1 4c fc 80 18 Ml...P.. t;v.L...
0030 04 e2 6f 73 00 00 01 01 08 0a 00 18 52 64 08 13 ..os.... ..Rd..
0040 98 9e 47 45 54 20 2f 70 75 62 6c 69 63 5f 68 74 ..GET /p ublic_ht
0050 6d 6c 2f 3f 6c 61 6e 67 75 61 67 65 3d 65 6e 26 ml/?lang uage=en&
0060 6f 6e 6c 79 3d 6f 6e 6c 69 6e 65 5f 63 69 6e 65 only=onl ine_cine
0070 6d 61 20 48 54 54 50 2f 31 2e 31 0d 0a 55 73 65 ma HTTP/ 1.1..Use
0080 72 2d 41 67 65 6e 74 3a 20 4d 6f 7a 69 6c 6c 61 r-Agent: Mozilla
0090 2f 35 2e 30 20 28 51 74 45 6d 62 65 64 64 65 64 /5.0 (Qt Embedded
00a0 3b 20 55 3b 20 4c 69 6e 75 78 3b 20 43 29 20 41 ; U; Lin ux; C) A
00b0 70 70 6c 65 57 65 62 4b 69 74 2f 35 33 33 2e 33 ppleWebK it/533.3
00c0 20 28 4b 48 54 4d 4c 2c 20 6c 69 6b 65 20 47 65 (KHTML, like Ge
00d0 63 6b 6f 29 20 4d 41 47 32 30 30 20 73 74 62 61 cko) MAG 200 stba
00e0 70 70 20 76 65 72 3a 20 33 20 72 65 76 3a 20 33 pp ver: 3 rev: 3
00f0 38 37 20 4d 6f 62 69 6c 65 20 53 61 66 61 72 69 87 Mobil e Safari
0100 2f 35 33 33 2e 33 0d 0a 43 6f 6e 6e 65 63 74 69 /533.3.. Connecti
0110 6f 6e 3a 20 4b 65 65 70 2d 41 6c 69 76 65 0d 0a on: Keep -Alive..

```

Channel One Capture

Packets: 2087 • Displayed: 1937 (92.8%) • Load time: 0:0.69

Profile: Default

11:11 AM 5/27/2016

EXHIBIT 15

IP Location Finder - Geolocation - Internet Explorer

https://www.iplocation.net/



File Edit View Favorites Tools Help

IP LOCATION

Provide support *Get help quick!!!* **CITRIX GoToAssist** Fearless remote support. *Try it free*

HOME WHAT IS MY IP HIDE IP CHANGE IP VPN COMPARISON FORUMS

Where is Geolocation of an IP Address?

CHRISTIE'S  **Geolocation for IP 66.234.224.2.**
 **Hide IP with VPN**

IP Location Finder

IPv4, IPv6 or Domain Name **IP Lookup**

Here are the results from a few Geolocation providers. Accuracy of geolocation data may vary from a provider to provider. Test drive yourself, and decide on the provider that you like.

Do you have a problem with IP location lookup? Report a problem.

SEARCH OUR WEBSITE

Let's go Custom Search **Search**

IP TOOLS


- Trace Email Source**
- Verify Email Address**
- Proxy Check**
- Subnet Calculator**

DOMAIN TOOLS

- Who is Hosting a Website**
- Reverse DNS Lookup**
- HTTP Server Header Check**

ADVERTISEMENT


DDoS Risk Calculator
 Calculate the Risk and Cost of a DDoS Attack on Your Website



CALCULATE NOW →

IMPERIA INCAPSULA


Geolocation data from IP2Location (Product: DB6, updated on 2016-5-1)

IP Address	Country	Region	City
66.234.224.2	United States 	New York	Manhattan

ISP	Organization	Latitude	Longitude
Transbeam Inc.	Not Available	40.754997253418	-73.993461608887

[AdChoices](#) [Find IP Location](#) [My IP Address](#) [Location Tracking](#) [IP Lookup](#)

https://www.googleadservices.com/pagead/clk?sa=L&ai=CqLUdmZ1V8PEtPbflG8kKqF1uvN40Trwem16wKQoqbtgMQASDfheAdYmN2pozQpQPoA+ig_XLASgBAppDAGpDwQScdIH1P0AY1QxvpDz...

Start 

11:22 AM 5/27/2016

EXHIBIT 16

Channel One Capture.pcapng

File Edit View Go Capture Analyze Statistics Telephony Wireless Tools Help

ip.addr==192.168.12.136

No.	Time	Source	Destination	Protocol	Length	Info
135	27.634204	37.58.59.33	192.168.12.136	TCP	74	80 → 52431 [SYN, ACK] Seq=0 Ack=1 Win=14480 Len=0 MSS=1428 SACK_PERM=1 TSval=858656634 TSecr=1614401 WS=128
136	27.634430	192.168.12.136	37.58.59.33	TCP	66	52431 → 80 [ACK] Seq=1 Ack=1 Win=5840 Len=0 TSval=1614492 TSecr=858656634
138	27.656407	37.58.59.33	192.168.12.136	TCP	74	80 → 52432 [SYN, ACK] Seq=0 Ack=1 Win=14480 Len=0 MSS=1428 SACK_PERM=1 TSval=858656639 TSecr=1614424 WS=128
139	27.656644	192.168.12.136	37.58.59.33	TCP	66	52432 → 80 [ACK] Seq=1 Ack=1 Win=5840 Len=0 TSval=1614514 TSecr=858656639
140	27.707873	192.168.12.136	37.58.59.33	HTTP	748	GET /stalker_portal/server/load.php?type=stb&action=get_preload_images&gmode=480&JsHttpRequest=9466867150903-xml...
141	27.712920	192.168.12.136	37.58.59.33	HTTP	776	GET /stalker_portal/server/load.php?type=watchdog&action=get_events&cur_play_type=0&event_active_id=0&init=1&Js...
142	27.712924	192.168.12.136	37.58.59.33	HTTP	731	GET /stalker_portal/server/load.php?type=itv&action=get_fav_ids&JsHttpRequest=9466867151917-xml HTTP/1.1
143	27.712926	192.168.12.136	37.58.59.33	HTTP	736	GET /stalker_portal/server/load.php?type=itv&action=get_all_channels&JsHttpRequest=9466867151675-xml HTTP/1.1
144	27.712928	192.168.12.136	37.58.59.33	HTTP	746	GET /stalker_portal/server/load.php?type=itv&action=get_all_fav_channels&fav=1&JsHttpRequest=9466867151796-xml ...
145	27.712956	192.168.12.136	37.58.59.33	HTTP	732	GET /stalker_portal/server/load.php?type=itv&action=get_epg_info&JsHttpRequest=9466867151284-xml HTTP/1.1
147	27.817188	37.58.59.33	192.168.12.136	HTTP	1346	HTTP/1.1 200 OK (text/plain)
148	27.817631	192.168.12.136	37.58.59.33	TCP	66	52427 → 80 [ACK] Seq=3637 Ack=13695 Win=36992 Len=0 TSval=1614675 TSecr=858656679

Frame 12: 371 bytes on wire (2968 bits), 371 bytes captured (2968 bits) on interface 0

Ethernet II, Src: Telecomu_09:7a:de (00:1a:79:09:7a:de), Dst: Dell_67:34:b6 (5c:26:0a:67:34:b6)

Internet Protocol Version 4, Src: 192.168.12.136, Dst: 37.48.77.49

Transmission Control Protocol, Src Port: 50715 (50715), Dst Port: 80 (80), Seq: 1, Ack: 1, Len: 305

Hypertext Transfer Protocol

```

0000 5c 26 0a 67 34 b6 00 1a 79 09 7a de 08 00 45 00 \&.g4... y.z...E.
0010 01 65 a9 65 40 00 40 06 50 9c c0 a8 0c 88 25 30 .e.e@.@. P....%0
0020 4d 31 c6 1b 00 50 05 c0 74 3b 76 d1 4c fc 80 18 M1...P.. t;v.L...
0030 04 e2 6f 73 00 00 01 01 08 0a 00 18 52 64 08 13 ..os.... ..Rd..
0040 98 9e 47 45 54 20 2f 70 75 62 6c 69 63 5f 68 74 ..GET /p ublic_ht
0050 6d 6c 2f 3f 6c 61 6e 67 75 61 67 65 3d 65 6e 26 ml/?lang uage=en&
0060 6f 6e 6c 79 3d 6f 6e 6c 69 6e 65 5f 63 69 6e 65 only=onl ine_cine
0070 6d 61 20 48 54 54 50 2f 31 2e 31 0d 0a 55 73 65 ma HTTP/ 1.1..Use
0080 72 2d 41 67 65 6e 74 3a 20 4d 6f 7a 69 6c 6c 61 r-Agent: Mozilla
0090 2f 35 2e 30 20 28 51 74 45 6d 62 65 64 64 65 64 /5.0 (Qt Embedded
00a0 3b 20 55 3b 20 4c 69 6e 75 78 3b 20 43 29 20 41 ; U; Lin ux; C) A
00b0 70 70 6c 65 57 65 62 4b 69 74 2f 35 33 33 2e 33 ppleWebK it/533.3
00c0 20 28 4b 48 54 4d 4c 2c 20 6c 69 6b 65 20 47 65 (KHTML, like Ge
00d0 63 6b 6f 29 20 4d 41 47 32 30 30 20 73 74 62 61 cko) MAG 200 stba
00e0 70 70 20 76 65 72 3a 20 33 20 72 65 76 3a 20 33 pp ver: 3 rev: 3
00f0 38 37 20 4d 6f 62 69 6c 65 20 53 61 66 61 72 69 87 Mobil e Safari
0100 2f 35 33 33 2e 33 0d 0a 43 6f 6e 6e 65 63 74 69 /533.3... Connecti
0110 6f 6e 3a 20 4b 65 65 70 2d 41 6c 69 76 65 0d 0a on: Keep -Alive..

```

Channel One Capture

Packets: 2087 · Displayed: 1937 (92.8%) · Load time: 0:0.69

Profile: Default

11:11 AM
5/27/2016

EXHIBIT 17

IP Location Finder - geolocation - Internet Explorer

https://www.iplocation.net/

File Edit View Favorites Tools Help

IP LOCATION

HOME WHAT IS MY IP HIDE IP CHANGE IP VPN COMPARISON FORUMS

Where is Geolocation of an IP Address?

G+1 2.9k

SAFETY TODAY
THE 2016 NISSAN ROGUE®

\$179
PER MONTH LEASE*
24 Months, \$2,000 Initial Payment, Excl. Taxes, \$500 Bonus Cash†
Ad starts on 2/1/16. ROGUE SE, AWD w/ Premium Package \$251 per month lease.

PLUS \$500 Bonus Cash†

SHOP NOW
BUILD

Geolocation for IP 37.58.59.33.
[Hide IP with VPN](#)

IP Location Finder
IPv4, IPv6 or Domain Name **IP Lookup**

Here are the results from a few Geolocation providers. Accuracy of geolocation data may vary from a provider to provider. Test drive yourself, and decide on the provider that you like.

Do you have a problem with IP location lookup?
[Report a problem.](#)

IP TOOLS

- [Trace Email Source](#)
- [Verify Email Address](#)
- [Proxy Check](#)
- [Subnet Calculator](#)

DOMAIN TOOLS

- [Who is Hosting a Website](#)
- [Reverse DNS Lookup](#)
- [HTTP Server Header Check](#)

ADVERTISEMENT

DDoS Risk Calculator
Calculate the Risk and Cost of a DDoS Attack on Your Website

CALCULATE NOW →

IMPERIA INCAPSULA

Geolocation data from IP2Location (Product: DB5, updated on 2016-5-1)

IP Address	Country	Region	City
37.58.59.33	Germany	Hessen	Frankfurt am Main

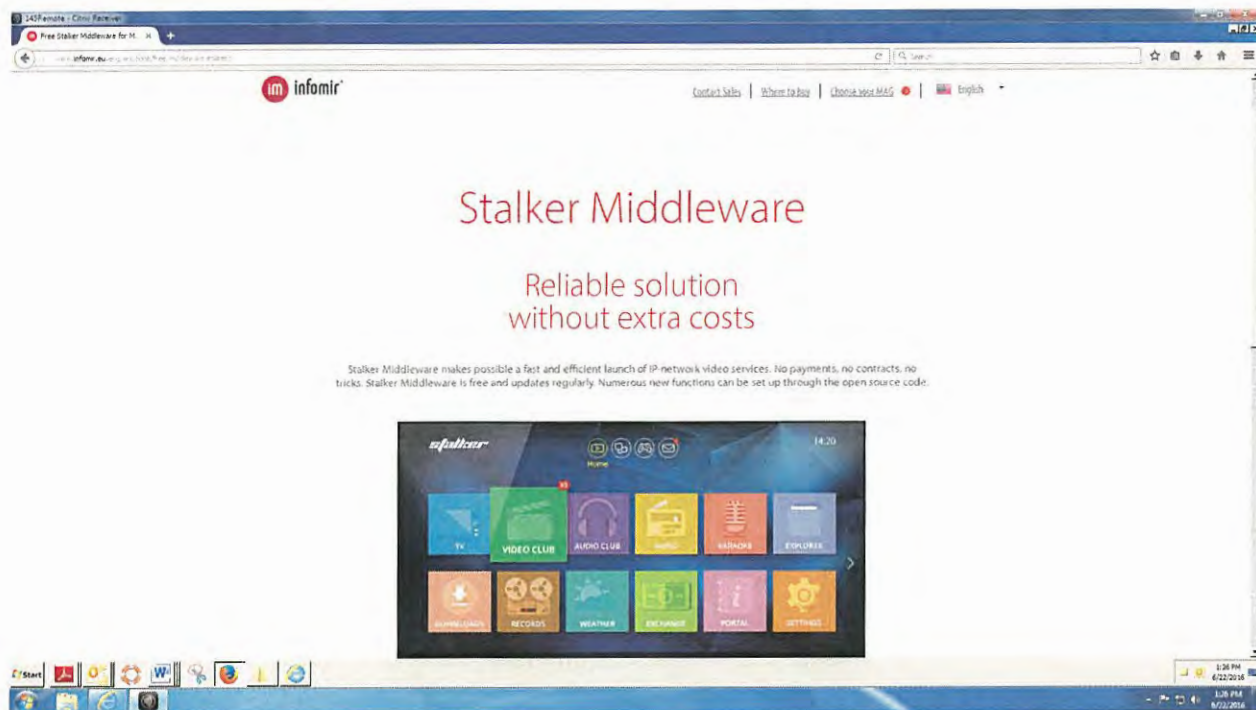
ISP	Organization	Latitude	Longitude
LeaseWeb Deutschland GmbH	Not Available	50.115520477295	8.6841697692871

AdChoices [Find IP Location](#) [My IP Address](#) [Location Tracking](#) [IP Lookup](#)

Start

11:20 AM 5/27/2016

EXHIBIT 18



145Remote - Citrix Receiver

Infomir - User devices for IPTV... X

infomir.eu

infomir


Contact Sales | Where to buy | Choose your MAG | English

Choose your MAG


Free Stalker Middleware

No fees. No obligations. No gimmicks. The simplicity and reliability is a motto of the best professionals in the industry. Middleware Stalker application is extremely easy to install, configure and operate. Open code provides you with unlimited opportunities for implementation of new options and functions for your customers.

Read more



MAGic Solution



MAGic Solution is a complete solution for quick and budget start-up of your IPTV/OTT project, designed specifically for ISPs, hotels, business centers, health care facilities, etc.

Start

1:16 PM 6/22/2016

EXHIBIT 19

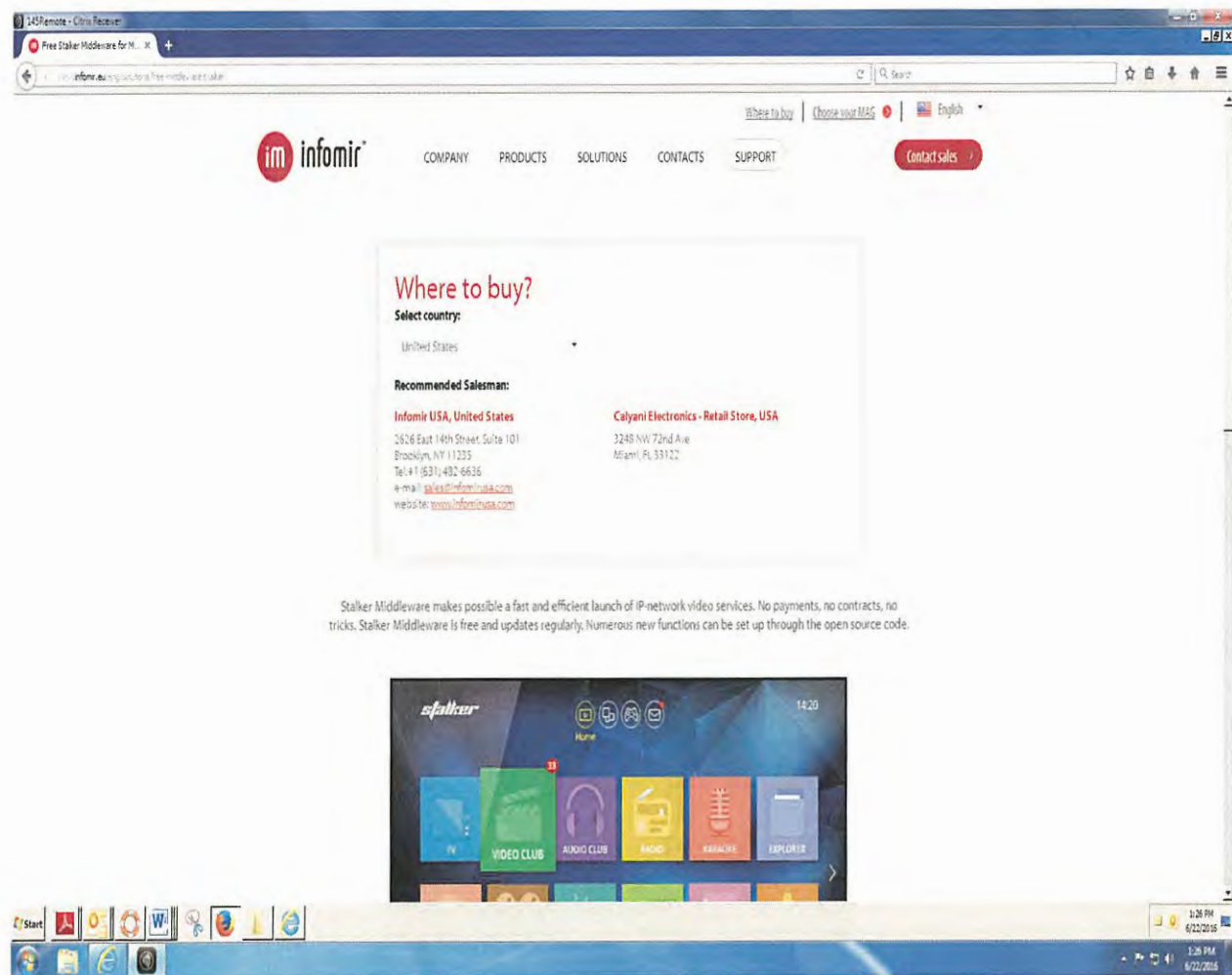


EXHIBIT 20

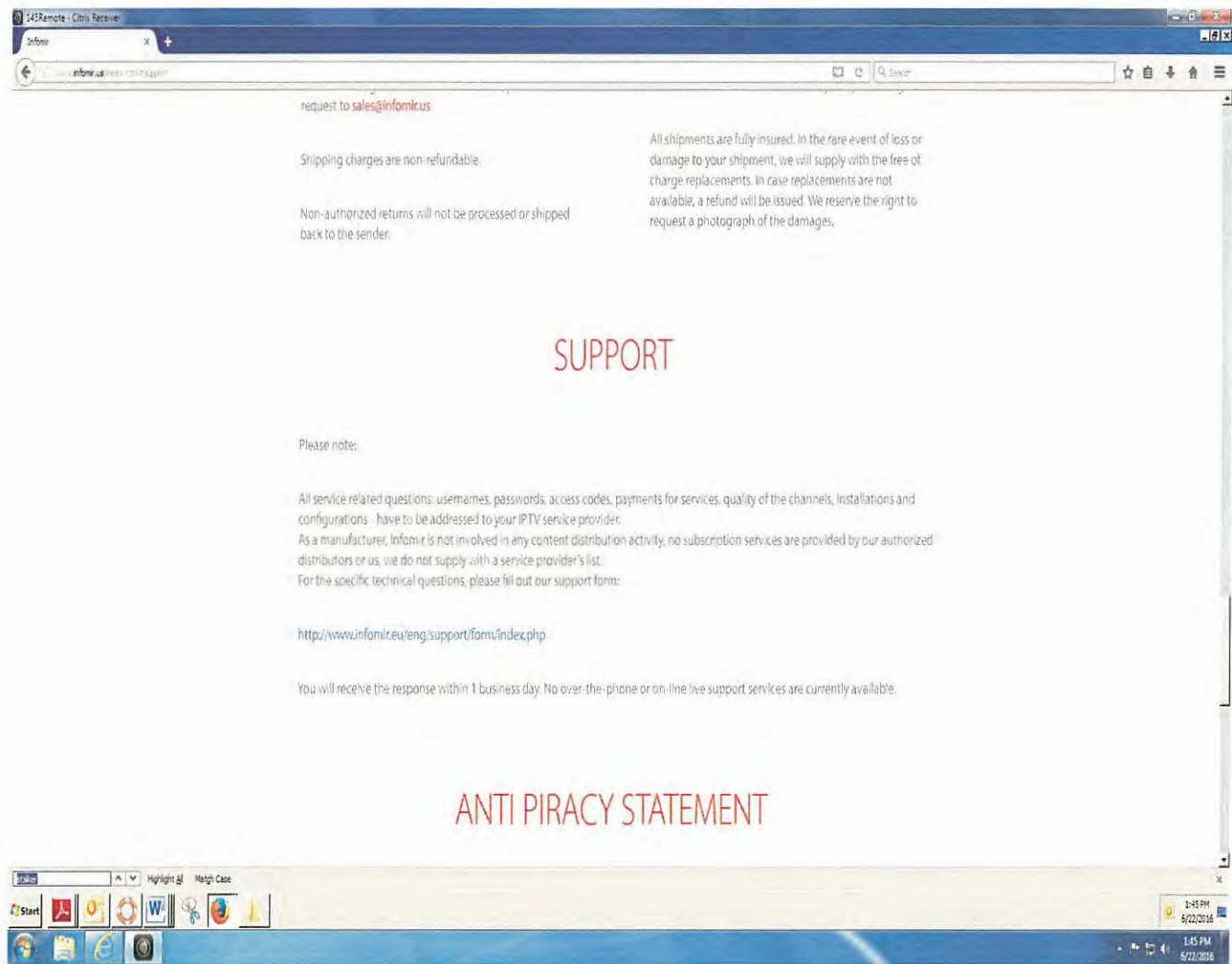


EXHIBIT 21

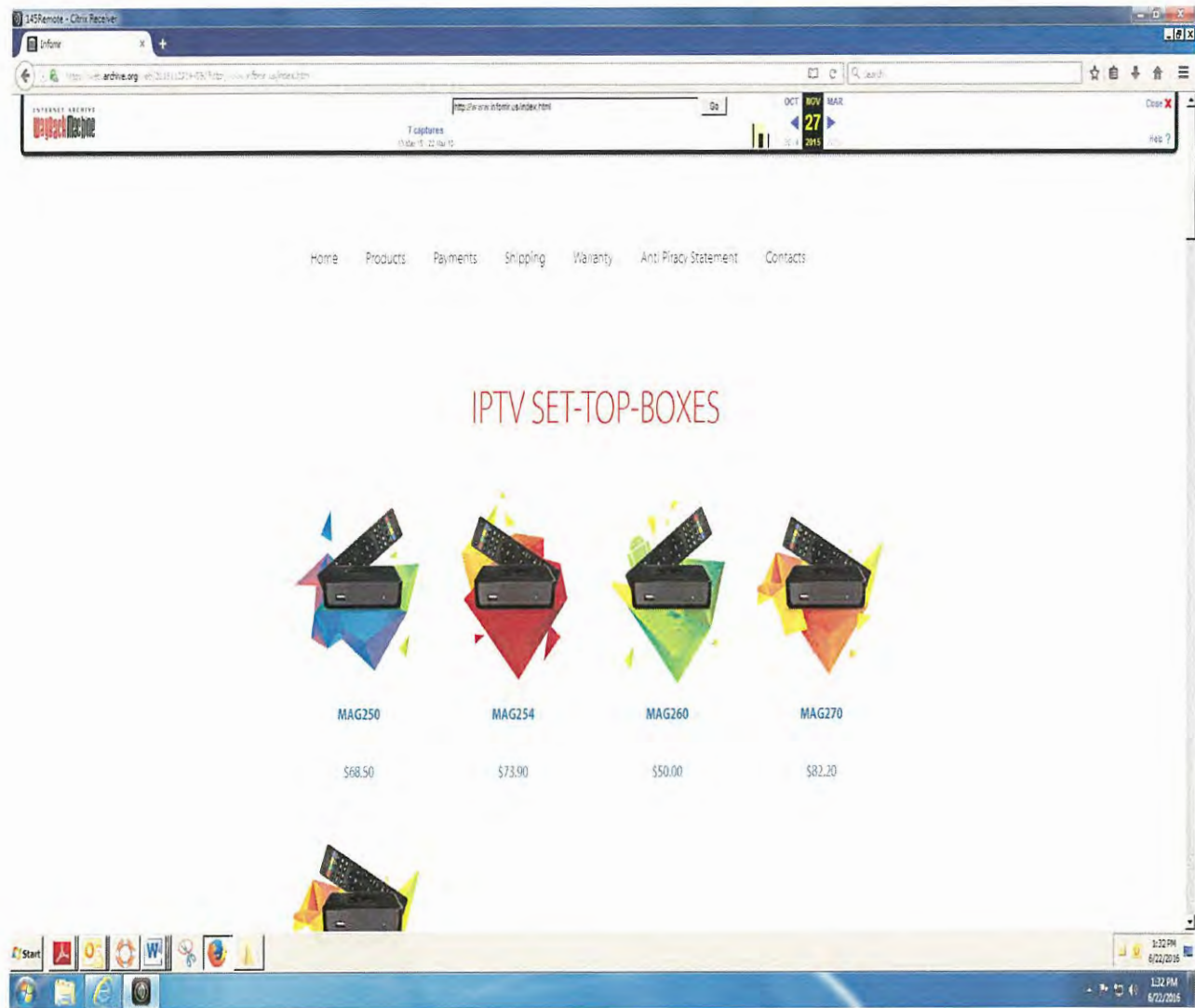


EXHIBIT 22

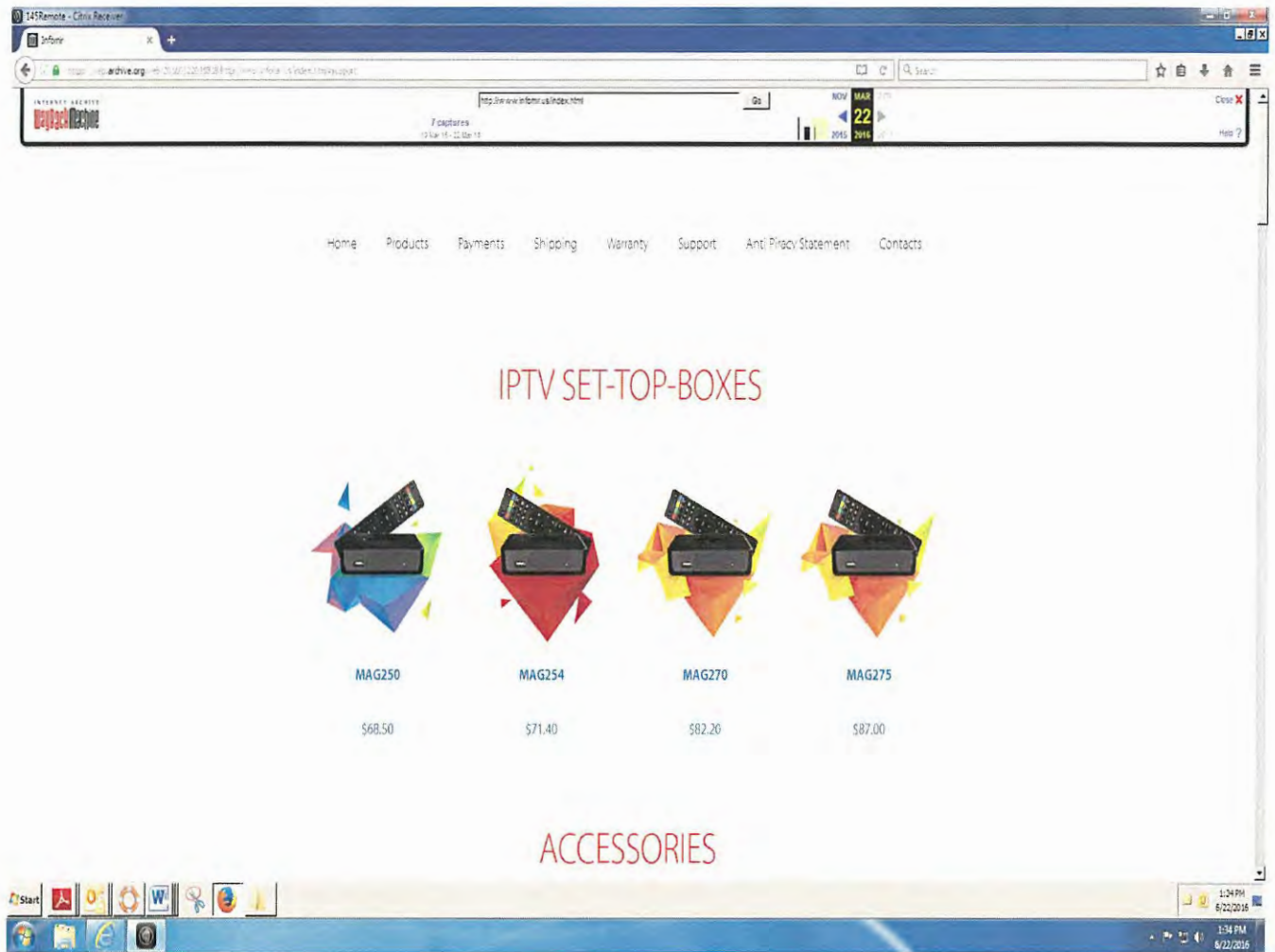


EXHIBIT 23

AO 399 (01/09) Waiver of the Service of Summons

UNITED STATES DISTRICT COURT

for the
Southern District of New York

Joint Stock Company "Channel One Russia Worldwide," et al.

Plaintiff

v.

Infomir, LLC et al.

Defendant

Civil Action No. 16-CV-1318

WAIVER OF THE SERVICE OF SUMMONS

To: Raymond J. Dowd

(Name of the plaintiff's attorney or unrepresented plaintiff)

I have received your request to waive service of a summons in this action along with a copy of the complaint, two copies of this waiver form, and a prepaid means of returning one signed copy of the form to you.

I, or the entity I represent, agree to save the expense of serving a summons and complaint in this case.

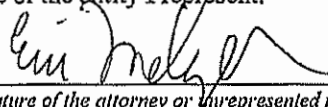
I understand that I, or the entity I represent, will keep all defenses or objections to the lawsuit, the court's jurisdiction, and the venue of the action, but that I waive any objections to the absence of a summons or of service.

I also understand that I, or the entity I represent, must file and serve an answer or a motion under Rule 12 within 60 days from 03/29/2016, the date when this request was sent (or 90 days if it was sent outside the United States). If I fail to do so, a default judgment will be entered against me or the entity I represent.

Date: 03/29/2016

Infomir, LLC

Printed name of party waiving service of summons


Signature of the attorney or unrepresented party

Eric Melzer, Stew Leviss

Printed name

75 Livingston Ave
Roseland, NJ 07068

Address

emelzer@blkgg.com; slewiss@blkgg.com

E-mail address

973-325-8347

Telephone number

Duty to Avoid Unnecessary Expenses of Serving a Summons

Rule 4 of the Federal Rules of Civil Procedure requires certain defendants to cooperate in saving unnecessary expenses of serving a summons and complaint. A defendant who is located in the United States and who fails to return a signed waiver of service requested by a plaintiff located in the United States will be required to pay the expenses of service, unless the defendant shows good cause for the failure.

"Good cause" does not include a belief that the lawsuit is groundless, or that it has been brought in an improper venue, or that the court has no jurisdiction over this matter or over the defendant or the defendant's property.

If the waiver is signed and returned, you can still make these and all other defenses and objections, but you cannot object to the absence of a summons or of service.

If you waive service, then you must, within the time specified on the waiver form, serve an answer or a motion under Rule 12 on the plaintiff and file a copy with the court. By signing and returning the waiver form, you are allowed more time to respond than if a summons had been served.